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April 15, 2021

VIA ECF

The Honorable Andre M. Espinosa
United States Magistrate Judge
for the District of New Jersey

Re: *Reshma Abell v. Pacira Pharmaceuticals, Inc., et al.*
Docket No.: 18-cv-16509 (MCA)(AME)

Dear Judge Espinosa:

This Firm represents Defendants Pacira Pharmaceuticals, Inc., Rich Kahr, Peter Murphy, Glenn Reiser, Dennis McLoughlin, and Paul Ciavolella (hereinafter as, “Defendants”) in the above-captioned matter. Pursuant to the Amended Scheduling Order dated February 2, 2021 (ECF No. 77), Defendants are permitted to file a motion for summary judgment on or before April 23, 2021. We write to respectfully request a fourteen day extension of Defendants’ time to file a summary judgment motion from April 23, 2021 to May 7, 2021. This is the Defendants’ first request for an extension of this deadline, and Plaintiff’s counsel consents to this request.

We thank the Court for its consideration of the foregoing request.

Respectfully submitted,

JACKSON LEWIS P.C.

/s/ James J. Panzini
James J. Panzini

C: All Counsel of Record (via ECF)
4819-6112-1510, v. 1